



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 20 2009

REPLY TO THE ATTENTION OF:

E-19J

Ms. Katherine S. Delaney  
Federal Aviation Administration, Detroit Airports District Office  
11677 South Wayne Road  
Suite 107  
Romulus, Michigan 48174

Re: Comments on the Port Columbus International Airport Final Environmental Impact Statement (EIS), City of Columbus, Ohio, EIS No. 20090074

Dear Ms. Delaney:

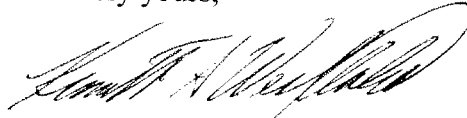
In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the United States Environmental Protection Agency (U.S. EPA) Region 5 has reviewed the Port Columbus International Airport Final Environmental Impact Statement (EIS). The proposed project is to reconstruct Runway 10R/28L in a way that preserves the airport's current and future flexibility to accommodate capacity needs both on the airfield and in the terminal and landside areas.

On July 11, 2008, U.S. EPA provided comments on the Draft EIS for this project. In our letter, we expressed environmental concerns with Particulate Matter – 2.5 microns or less (PM<sub>2.5</sub>), and we suggested mitigation measures that could help minimize PM<sub>2.5</sub> emissions. In particular, we recommended implementation of a comprehensive air mitigation plan that would include a diesel emissions reduction program for construction and operation and measures to address hazardous air pollutants emissions from aircraft taxiing and idling. We acknowledge the additional information on these concerns that was included in the Final EIS. Despite the fact that the project meets general conformity, we are retaining our concerns because the Final EIS is not clear on how PM<sub>2.5</sub> emissions would be minimized. We recommend that the Record of Decision provide a commitment as to how PM<sub>2.5</sub> emissions will be mitigated. Our detailed comments on PM<sub>2.5</sub> are enclosed.

Thank you for the opportunity to comment on the Final EIS for this project. If you have any questions, please contact me at (312) 886-2910. The staff person assigned to this

project is Sherry Kamke; she can be reached at (312) 353-5794 or via email at [kamke.sherry@epa.gov](mailto:kamke.sherry@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written in a cursive style.

Kenneth A. Westlake, Supervisor  
NEPA Implementation  
Office of Enforcement and Compliance Assurance

Enclosure

***Detailed Comments on the Final Environmental Impact Statement for the  
Port Columbus International Airport***

General Conformity Status - The documentation in the Final EIS satisfactorily demonstrates that the emissions for the project are below the General Conformity de minimis level of 100 tons per year for each pollutant and precursor. General Conformity applies to all federal projects in nonattainment and maintenance areas. The Columbus area is nonattainment for both ozone and PM2.5. PM2.5 emissions for the Port Columbus project are below the 100 ton per year de minimis level.

Transition to More Rigorous PM2.5 Standard and Grace Period - In our Draft EIS comments, we indicated that increases of PM2.5 emissions were problematic, even if they are below de minimis levels, because they add to the cumulative emissions in the airshed. On December 18, 2006, U.S. EPA reduced the PM2.5 National Ambient Air Quality Standard (NAAQS) from 65 ug/m3 to 35 ug/m3 in a 24-hour period, based on the latest health studies. The annual standard remained at 15 ug/m3 for PM2.5. However, U.S. EPA has not yet completed designation of areas for the new 35 ug/m3 24 hour PM2.5 standard. Columbus, Ohio is currently nonattainment for the annual PM2.5 standard. The Ohio Environmental Protection Agency (OEPA) has submitted to us an attainment demonstration to show how the area will reach attainment of the annual standard. The monitoring data in Columbus shows nonattainment for the 35 ug/m3 24-hour PM2.5 standard. U.S. EPA has listed Columbus as an area that is not attaining the 24-hour standard. The designation process for the new 24-hour PM2.5 standard has not been completed, and the Federal Register notice designating areas has not been published. The conformity process (both General and Transportation conformity) allows a 1-year grace period after designation of areas before conformity to the new standard must be demonstrated. However, we believe it is appropriate to compare the project's status to the new 35 ug/m3 24-hour standard and to discuss steps that may need to be taken for the area's air quality to meet the new 24-hour standard.

Port Columbus Air Emissions in Context - EPA is concerned about the high levels of PM2.5 that the modeling indicates will be in the vicinity of the airport, and the airport's contribution to continued high PM2.5 concentrations in the future. The documentation in the Final EIS compares the modeled emission concentrations to the new 35 ug/m3 24-hour standard in Table 4-12. Although the modeled concentrations are below the old 65 ug/m3 24-hour standard, the concentrations at all modeling sites are above the newer 35 ug/m3 standard. The analysis summarized in Table 4-12 shows that the airport contribution is typically 2-4 ug/m3. We note that several tables in Section 5.5 of the Final EIS show that the arrival curb is modeled with a pollutant concentration of 9.78 ug/m3 (the highest receptor site in the alternatives modeling).

In summary, the modeling in the Final EIS indicates that the new 24-hour PM2.5 standard of 35 ug/m3 is violated at all of the modeling locations (Table 4-12). The annual PM2.5 standard is also violated at all of the modeling locations (Table 4-12). The modeling also indicates that air impacts of this project will contribute 1 - 10 ug/m3 to the ambient concentrations of 24-hour PM2.5. However, we note that the background level

for 24 hour PM<sub>2.5</sub> is 52 ug/m<sup>3</sup>, which is already over the 35 ug/m<sup>3</sup> 24-hour PM<sub>2.5</sub> standard. Also the background for the annual standard is listed as 16.6 ug/m<sup>3</sup>, which is above the 15 ug/m<sup>3</sup> standard. We recognize that many sources, both regional and local, are contributing to the nonattainment. OEPA has already submitted an attainment demonstration for the annual PM<sub>2.5</sub> standard. Once the designation process is completed for the new 24-hour PM<sub>2.5</sub> standard (35 ug/m<sup>3</sup>), OEPA has 3 years to develop and submit a state implementation plan (SIP) for attainment of that new standard. OEPA will soon begin work to develop this SIP, which will determine the control strategies that will bring the air quality into compliance with the 35 ug/m<sup>3</sup> standard.

Need for PM<sub>2.5</sub> Mitigation Commitments - The project has the potential to contribute to continued nonattainment for the 24 hour PM<sub>2.5</sub> standard in the area of the airport. We acknowledge that the background concentrations of PM<sub>2.5</sub> are already high and already above both the annual and 24-hour standards. Columbus, Ohio already has serious air pollution problems. Because of the impact of PM<sub>2.5</sub> and diesel emissions on human health, EPA has emphasized the need to address both pollutants through the National Clean Diesel Campaign and various regional and local initiatives. Work is currently underway to develop and implement national, regional, and local control programs that will assist in bringing this area into attainment of the health-based PM<sub>2.5</sub> standard as expeditiously as practicable. We recognize, however, that despite implementation of national air pollution control programs, additional local controls may be necessary for this area to reach attainment of the NAAQS for PM<sub>2.5</sub>. As a result, the state may need to consider significant local emissions reductions beyond current levels in order to attain the new 24-hour PM<sub>2.5</sub> standard. Therefore, this proposed project has the potential to make it more difficult to attain the PM<sub>2.5</sub> NAAQS.

According to the Final EIS, FAA has presented U.S. EPA's comments on air quality mitigation measures to the Columbus Regional Airport Authority (CRAA) for their consideration for the Port Columbus International Airport project. The FINAL EIS also provides a discussion of sustainable design and development opportunities that the CRAA may consider for each airport in the system (Port Columbus International Airport, Rickenbacker International, and Bolton Field Airport). We understand that CRAA is developing and implementing a Sustainable Design Guidance Manual for use in implementing CRAA's five-year Capital Improvement Program. These are encouraging steps. However, the Final EIS does not provide any assurance that the mitigation measures will be implemented at Port Columbus.

We recommend that the Record of Decision (ROD) for this project include mitigation measures that reduce PM<sub>2.5</sub> at the airport. We continue to encourage FAA to work with the project sponsors to adopt practices to reduce jet aircraft idling and to assess options for a comprehensive Airport Diesel Emissions Reduction Program that would address diesel emissions from multiple source categories in construction, ground transportation, and airport operations.

Such a program could include at a minimum:

- Retrofitting off-road construction equipment, including repower or engine upgrades.
- Requiring use of low sulfur or ultra-low sulfur fuels and construction equipment fitted with U.S. EPA or California Air Resource Board (CARB)-verified retrofit technologies.
- Limiting the age of on-road vehicles in construction projects to 1998 and newer and the age of off-road equipment to 1996 and newer.
- Implementing of a fugitive dust control plan.
- Using diesel particulate traps and oxidation catalysts.
- Using existing power sources or clean fuel generators rather than temporary power generators.
- Encouraging the use of off-road equipment that meets the Tier 3 standards.
- Converting all diesel ground support equipment to compressed natural gas, propane, or electric power.
- Using alternate fuel and retrofits for internal bus and shuttle transportation.
- Implementing time and transportation management practices and oversight that would minimize idling and queuing of diesel construction equipment and ground support equipment.

In the event that specific measures can not be committed to at the time of the ROD, we recommend that a process for evaluating these measures in the context of OEPA's SIP development be committed to in the ROD.